

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA

FILED

OCT - 7 2008

TERESA L. GIBSON, CLERK
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA

William L. Garrett, Jr.

WV DOC # 14899

Rm. 138 - Pine Hall, One Mounta-
inside Way, Mt. Olive, W.Va.

Date: 5 OCT 08

(Enter above the full name of the plaintiff
or plaintiffs in this action).

(Inmate Reg. # of each Plaintiff)

VERSUS

CIVIL ACTION NO. 2:08-1150
(Number to be assigned by Court)

Denver Russell, in his Individual & Official Capacity
Mark Crawford, in his Individual & Official Capacity-
Acting Librarian, Law Librarian

Paul Lytle, Associate Warden Programs; Official, & Individual
(Enter above the full name of the defendant
or defendants in this action) Capacity

COMPLAINT

1. Previous Lawsuits

- A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment?

Yes _____

No X

- B. If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline).

1. Parties to this previous lawsuit:

Plaintiffs: None

Defendants: None

2. Court (if federal court, name the district; if state court, name the county);

N/A

3. Docket Number: N/A

4. Name of judge to whom case was assigned:

N/A

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

N/A

6. Approximate date of filing lawsuit: N/A

7. Approximate date of disposition: N/A

II. Place of Present Confinement: Rm. 138 - Pine Hall, One Mountain side
Way Mt. Olive, WV 25185

A. Is there a prisoner grievance procedure in this institution?

Yes X No _____

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes X No _____

C. If you answer is YES:

1. What steps did you take? I filed the Grievance
to the lower Staff, i.e. Unit Manager's

2. What was the result? Denied
appealed to the Warden, result Denied,
then I filed to the Commissioner. He Avoided Answering.

D. If your answer is NO, explain why not: _____

III. Parties

(In item A below, place your name and inmate registration number in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of Plaintiff: William L. Garrett, Jr.

Rm. 138 - Pine Hall, WV's DOC # 14899;
Address: One Mountain side Way, Mt. Olive, WV 25185

B. Additional Plaintiff(s) and Address(es): _____

(In item C below, place the full name of the defendant in the first blank, his/her official position in the second blank, and his/her place of employment in the third blank. Use item D for the names, positions, and places of employment of any additional defendants.)

C. Defendant: Denver Russell, In his Individual & Official Capacity
is employed as: Fire/SAFETY & Sanitation Inspector
at Mt. Olive Correctional Complex

D. Additional defendants: Paul Lytle, Associate Warden Programs;
Individual & Official Capacity; Mark Crawford
Acting Librarian, Law Librarian, Without a license
to Practice law & Without Skills Of Legal Methods I
(Analysis, Research and Writing) No Knowledge Of Professions)

IV. Statement of Claim Responsibility

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

I have tried not to sue the defendants
for years, I have no wishes to sue until
I'm free, It was a long time before
I realized I was a victim of False
Imprisonment/Kidnapping

Janet Payne

D. additional Defendants Janet Payne, Unit
Manager, # Pine Hall.

(2) John C. Young, Institutional Bailiff,

(3) Brine Greenwood, Institutional Magistrate,

(4) Mr. Bostic, Correctional

Counselor, (5) Mr. Mike Sawyer, Correctional

Counselor, (6) Mr. Paul Parry, Associate Warden

Security, (7) CCO Major Robert Rhodes,

(8) David Ballard, Warden, (9) Larry Patter,

Program Manager, (10) Kathy Dillion,

Paralegal

IV. Statement of Claim (continued):

V. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments.
Cite no cases or statutes.

appoint Counsel, Set me free
Immediately if not sooner, order
Compensation, since approx. June 30,
1993 for False Imprisonment

V. Relief (continued)):

VII. Counsel

- A. If someone other than a lawyer is assisting you in preparing this case, state the person's name:

N/A

- B. Have you made any effort to contact a private lawyer to determine if he or she would represent you in this civil action?

Yes X No

If so, state the name(s) and address(es) of each lawyer contacted: ABA

State by State Director of Pro Bono
Attorneys; Legal Aid Society of Charleston
922 Quarrier Street, Ste. 500 Charleston, WV 25301-2620

If not, state your reasons:

They lied to me, they see me as a prisoner,
rather than a Victim of False Imprisonment.

- C. Have you previously had a lawyer representing you in a civil action in this court?

Yes No X

If so, state the lawyer's name and address:

Signed this 5 day of October, 2008.

William L. Garrett, Jr.

Signature of Plaintiff or Plaintiffs

I declare under penalty of perjury that the foregoing is true and correct. & a willingness
to take and Pass Polygraph
Executed on 5 Oct 08
(Date)

William L. Garrett, Jr.
Signature of Movant/Plaintiff

Signature of Attorney
(if any)